

Exhibit 4

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Emily Doe)	Civil Action No.: 4:20-cv-04445-SAL
)	
Plaintiff)	
)	
vs.)	AFFIDAVIT OF
)	EMILY DOE
)	
American University of Antigua Inc.,)	
)	
)	
Defendant)	
)	
)	
)	
_____)	

Personally appeared before me, Emily Doe, who being duly sworn, deposes and says that:

1. I am over the age of 18 years and am competent to state the matters set forth herein.

As to those matters stated on information and belief, I have a good faith basis for believing them to be true.

2. I am the plaintiff in the instant matter, proceeding under a pseudonym in accordance to my request to the court.

3. The notary who notarized this affidavit has been shown my actual identification, as well as documents reflecting that I am appearing in this matter as Emily Doe.

4. At the time I applied for admission to AUA in 2015, I was a resident of South Carolina. I remained a resident of South Carolina throughout my four years as a student at AUA. All documents sent by me from AUA by mail were sent to me at my South Carolina address.

5. I rented temporary residences while in Antigua while attending classes on campus at AUA, but at all times, I remained a resident of South Carolina. I maintained a South Carolina driver's license throughout my time as a student.
6. On February 13, 2020, I was advised by an employee of Manipal Education Centers, as agent for AUA, that AUA had signed a contract with Health Corporation of America to permit me to do two (2) elective rotations later that year at Grand Strand Medical Center. **Exhibit A.**
7. I obtained approval from the Executive Clinical Dean at AUA to do these rotations at Grand Strand Medical Center in Myrtle Beach, SC.
8. On May 13, 2020, AUA sent a letter to Grand Strand Regional Medical Center advising that I had been granted permission to do a clinical clerkship at Grand Strand. **Exhibit B.**
9. I received email notice of my rotation from Grand Strand via email on July 20, 2020. I was required to bring "your school's evaluation to complete on you weekly, as well as your primary Resident an evaluation at the end of your rotation. Please provide copies of your school's evaluations at the end of my rotation, they will then be collected on your file week to be complied for your grade with your school." **Exhibit C.** This confirmed that my supervisors at Grand Strand would be communicating about my progress during my rotation with agents of AUA. I am informed and believe that all evaluations were submitted as required, both by Grand Strand and by AUA.
10. As part of my coursework as a student at AUA, and with the permission of AUA, I was doing rotations Grand Strand Medical Center in Myrtle Beach, South Carolina

from August 3, 2020 to August 28, 2020 and again August 31, 2020 to September 25, 2020. These rotations were in Internal Medicine and Anesthesia .

11. I submitted 10-panel drug screen reports on numerous occasions from Lab Corp in Myrtle Beach throughout my four years as a student at AUA. The earliest one I have a copy of is 2018, but I am informed and believe I submitted them from the same Lab Corp location throughout my rotation period as a student at AUA.
12. At no time was I told that a South Carolina drug screen was insufficient or that it has to be from some other location other than South Carolina.
13. On August 24, 2020, while doing my rotation at Grand Strand in Myrtle Beach, I received an email from an employee of Manipal Education Americas, LLC, acting as an agent for AUA, telling me I needed to submit an updated 10-panel drug screen no later than September 2, 2020. South Carolina was in the midst of Covid, and lab hours at all available labs were limited.
14. From my personal computer in South Carolina I submitted a copy of an earlier drug screen taken in Myrtle Beach with an altered date on August 24, 2020. The results were the same; all my prior drug screens have been negative. However, the date was changed.
15. I submitted a new and accurate (and negative) drug screen taken at an urgent care in Myrtle Beach on August 28, 2020. The lab report was transmitted from South Carolina to AUA on that date.
16. On August 27, 2020, while in South Carolina, I received an email for a Zoom meeting with Dr. Reza Sanii scheduled for August 31, 2020. I was in South Carolina when I received the email.

17. From my personal computer in South Carolina, I emailed Dr. Sanii and admitted that a drug screen I submitted on August 24, 2020 was not authentic.
18. I participated in the Zoom call with Dr. Sanii on August 31, 2020 from Myrtle Beach, South Carolina and freely admitted I had submitted an altered drug screen (altered only as to the date, not the results) and then a valid drug screen on August 28, 2020.
19. On September 3, 2020, while still in South Carolina, I received via email a "notice of misconduct" from the Professional Standards Committee at AUA.
20. After hours, while in Myrtle Beach as part of my course work for AUA doing my Anesthesia rotation, on September 12, 2020, I had a Zoom call with Dr. Vernon Lindsay as part of an investigation by AUA. I was physically located in South Carolina at the time of the Zoom.
21. On September 16, 2020, I received an email advising me that advised Dr. Peter Bell, the Dean of Clinical Services at AUA, had brought allegations against me in connection with the altered drug screen. I was in South Carolina when I received the notice.
22. I attended a virtual hearing using Microsoft Teams from Myrtle Beach on September 21, 2020, at which time AUA tried the professional standards case against me. My father was also with me in South Carolina and we both participated from the same computer.
23. On September 28, 2020, while still in Myrtle Beach, I received notice from Dr. Peter Bell that I was being dismissed from AUA.

24. The conduct about which AUA filed a complaint against me, the hearing on the charges against me and the results of the disciplinary proceeding all occurred while I was physically located in South Carolina.

Further, deponent sayeth not.

Emily Doe

Emily Doe

Sworn to before me this
6th day of October, 2021

Paula Campion

Notary public for:

My commission expires:

PAULA CAMPION
Notary Public, State of New York
Qual. in Onondaga Co. No. 01CA6153820
My Commission Expires Oct. 16, 2022

Melissa Morell <mmorell@AUAMED.ORG>

Thu 2/13/2020 12:01 PM



Exhibit A

To: ,Emily-Lauren

Cc: Rivera, Jason

Good morning Emily,

The contract with HCA has been signed. You will be limited to two 4-week electives. Please work with your coordinator to have them reviewed by the Executive Clinical Dena for approval.

Best regards,

Melissa Morell

Executive Director, Clinical Sciences Administration

o: (212) 661-8899, ext. 167

i: (646) 390-4947

mmorell@auamed.org

Manipal Education Americas, LLC Representative for

American University of Antigua College of Medicine

1 Battery Park Plaza, 33rd floor

New York, NY 10004

www.auamed.org



COLLEGE OF MEDICINE

Exhibit B

May 13, 2020

UNKNOWN UNKNOWN
 Grand Strand Regional Medical Center
 809 82nd Pkwy
 Myrtle Beach, SC 29572

Dear Ms. UNKNOWN:

This is to inform you that the student named below is currently enrolled in American University of Antigua and is in good standing. This student has permission to do clinical clerkships subject to your approval. Please confirm the student's arrival to begin the scheduled clerkship(s) so that we can award appropriate academic credit.

Name of Student	Academic Year	Rotation Range	Clerkship	Hospital
, Emily	3rd	Aug 3 2020 5:42PM - Aug 28 2020 5:42PM	Internal Medicine (4w Core)	Grand Strand Regional Medical Center

Personal Coverage is the responsibility of the student. However, professional liability is the responsibility of American University of Antigua while the student is in clerkship assignment.

Sincerely,

Craig Hauser
 Associate Vice President for Academic Administration

Manipal Education Americas, LLC agent for
 American University of Antigua
 One Batter Park Plaza, 33rd Floor, New York, NY 10004
 1-888-AUA-UMED
www.auamed.org



Richardson Kam <Kam.Richardson@hcahealthcare.com>

Mon 7/20/2020 2:50 PM

To: Maggioncalda ,Emily-Lauren



Exhibit C

Dear **Emily**: I hope this note finds you well. I have that you will be on your Internal Medicine rotation at **Grand Strand** Hospital August 3-28, 2020.

Grand Strand Hospital is located on 809 82nd Parkway Myrtle Beach, SC.

Please report to the Ocean View Education Center located on **900 79th Avenue North in Myrtle Beach at 8:30 am August 3, 2020**, to attend a PPE/COVID 19 review and to obtain your ID. From there I will introduce you to Mr. Val Cuisson, who will conduct your IT training. At 1:00pm, please report to the Resident's Lounge on the first floor of the hospital to meet with Dr. Sherertz and Team B to begin your rotation. The Internal Medicine Program Director, has asked that you give your attending your school's evaluation to complete on you weekly, as well as your primary Resident an evaluation at the end of your rotation. Please provide copies of your school's evaluation to these preceptors, they will then be collected on your final week to be complied for your grade with your school.

Students wear professional attire and Lab Coat on their first day.

Should you have any further questions or concerns, please do not hesitate to contact me.

We will look forward to meeting you.

Sincerely,

Kam Richardson